

REMARKS

Applicants thank the Examiner for examining the application. In response, Applicants have canceled claims 1-79 and submit new claims 80-123. No new matter has been added by new claims 80-123, and support for new claims 80-123 may be found throughout the specification.

Claim Rejections - 35 U.S.C. § 112 ¶2

The Examiner rejected claims 1-79 under 35 U.S.C. § 112 ¶2. Applicants believe that new claims 80-123 fully comply with all the requirements of 35 U.S.C. § 112, including ¶2.

Claim Rejections - 35 U.S.C. § 102(b)

The Examiner rejected cancelled claims 1-79 under 35 U.S.C. § 102(b) as defining subject matter anticipated by U.S. Patent No. 5,799,063 to Krane (“Krane”). Below, Applicants discuss new claims 80-123 in light of Krane and demonstrate that Krane does not anticipate the subject matter that new claims 80-123 define.

Applicants’ new independent claim 80 requires, among other things, that a second identifier be received from an initiating device that includes a display, by which the at least one text document may be displayed. Krane does not disclose this concept. The device in Krane that corresponds most closely to the initiating device required by Applicants’ independent claim 80 is the telephone link 4, which is a standard telephone and thus does

not include a display by which at least one text document may be displayed. Thus, Krane does not disclose receiving the second identifier from an initiating device including a display, by which the at least one text document may be displayed as required by Applicants' independent claim 80.

Applicants' new independent claim 80 also requires, among other things, that in response to the receipt of the second identifier from the initiating device, the initiating device be sent the at least one text document and the audio data stored most recently in response to receipt of the first identifier. The telephone link 4 in Krane is a standard telephone; it does not receive both audio data and at least one text document, as Applicants' independent claim 80 requires. Rather, Krane discloses sending the telephone link 4 only a pre-recorded audio message; *see* col. 2, line 23 to col. 3, line 14.

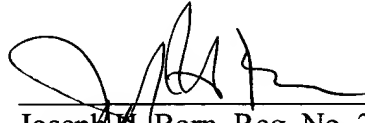
Applicants' independent claims 91, 102, and 113 include limitations that are similar to those of Applicants' independent claim 80 and that similarly avoid anticipation by Krane. And, since Krane does not anticipate Applicants' new independent claims 80, 91, 102, and 113, Krane does not anticipate Applicants' new dependent claims 81-90, 92-101, 103-112, and 114-123, which depend on independent claims 80, 91, 102, and 113, respectively.

CONCLUSION

Applicants respectfully request this application's early allowance.

Respectfully submitted,

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